

MEMORANDUM FOR ACTING COMMANDER

SUBJECT: Report of Assessment Team, The Dalles Oil Spill

1. We received an electronic copy of the outside assessment team's report at approximately 1200 hours. The report identifies 10 contributing items leading to the spill, 8 actions that would have lessened the event, and 13 recommendations to prevent similar occurrences in the future.

2. Based on the verbal out-briefing we received on 3 February I have already taken the following actions:

a. I instructed all the Operations Managers in Portland District to make an immediate assessment of all secondary containment on their projects. They are reviewing capacity, the location of any construction/expansion joints, and any unsealed piping penetrations.

b. All projects are to assure that they have an up-to-date inventory of oils stored and used on the projects and that all current gauges are functional. Further, they are to identify where additional gauges are needed and the potential cost and sources.

c. The OMs are in the process of re-examining the inventory, locations and the ease of deploying appropriate oil containment equipment. I have asked each project to give me an estimate of additional equipment they need.

d. The only other water-cooled transformers in the district are at Lookout Point and Detroit. The design of these transformers is completely different from the one at The Dalles. However, I have shared information about The Dalles spill in order to prevent a similar occurrence of these problems.

e. I am sharing the information in this report with other Corps hydropower districts. Omaha and Walla Walla districts do have water-cooled transformers, but the designs are significantly different and less likely to experience freezing.

f. I have asked the project OMs to review their maintenance procedures, inspection logs and other records. On 11 February 2004 I will convene a meeting of all our maintenance chiefs to review this report and make additional recommendations for actions that can be taken to avoid release of oil into the environment.

g. All NWP's Spill Prevention, Containment and Countermeasures (SPCC) and spill response plans are being reviewed in light of this incident. While the plans meet current requirements I believe we should be able to enhance communications at a minimum and clarify the contracting procedures.

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h. I have instructed all projects to report the maximum amount of a possible spill quantity initially, and then correct as details become available.

2. In response to the external team report I cannot disagree with any of the recommendations. My primary focus is to eliminate the causes for the spills.

a. We have accelerated the replacement of the T2 transformers. A design meeting with Hydroelectric Design Center (HDC) was held today. We expect to have the transformers replaced by the start of FY 06. We will conduct a review of other equipment that may be obsolete and present a higher risk of spill.

b. Each OM will assure that project maintenance and clearance procedures are clear, complete, and followed. The best maintenance practices will be shared and all requirements for preventative maintenance will be followed and reviewed by the project staff. During the February or March safety meetings project employees will review project spill response and/or Safe Clearance procedures with respect to this incident.

c. Each project will develop and implement pre-deployment of oil booms when high risk maintenance is performed. Spill response equipment will be staged as recommended in the report.

d. We will obtain the necessary training to assure that NWP projects on the Columbia River can deploy booms quickly if and when a spill occurs.

e. Specific written guidance on the content and frequency of operator shift and maintenance inspections will be updated. Each project will determine the need for additional gauges and include the reading of these gauges into their appropriate inspection procedures.

f. BPA, Tribal and potentially impacted entities down stream of the dams will be identified and added to the SPCC and Spill Response Plans. Guidance for contracting will be re-written as recommended.

g. All non-conducting dielectric cooling water connections will be inspected and replaced where necessary. Deluge systems will also be inspected and tested.

h. Clearance procedures for draining cooling water will be reviewed and updated based on the findings and recommendations of this report.

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- i. An engineering assessment will be performed on the recommendations for assuring the adequacy of gauges, drains, and plugs; then the necessary changes will be scheduled.
  - j. I will convene a group of state, federal, tribal and stakeholders to review our communication and spill response processes within the next 60 days.
  - k. I will assure that the necessary project and district management support is provided to improve our preventive maintenance activities and to facilitate both the clean-up effort and communication.
  - l. As all outside transformers are replaced they will be upgraded with air-cooled units.
  - m. Projects will periodically fill secondary containment areas with water to check for leakage.
  - n. Low oil alarms will remain operable on equipment, even if the equipment is taken out of service (except when alarms themselves need to be maintained).
  - o. A formal check sheet will be developed and provided for operators' daily and/or shift inspections that will be initialed when complete.
  - p. OMs will verify that there are no transformers containing PCB oils on Corps projects in this district. NWP projects will examine existing transformers for the possibility of PCB contamination of non-PCB oil due to the past use of oils containing PCBs.
3. I am very pleased with the quality and comprehensiveness of this report. I expect these actions, except where otherwise noted, to be completed within the next 3 months.

DEBORAH L. CHENOWETH  
Chief, Operations Division